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September 19, 2023

**VIA ECF**

The Honorable Denise L. Cote  
United States District Court Judge  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, New York 10007

***In Re: Acetaminophen ASD/ADHD Products Liability Litig.; 1:22-md-3043 (DLC)***  
**Defendants' Letter Regarding Rule 702 Briefing Order**

Dear Judge Cote,

Pursuant to the Court's August 3, 2023 Order (DE 805), Defendants submit this letter to address the Court's requests stated therein.

As to Paragraph (1) of the August 3 Order, Defendants respectfully submit that the Court should review and address Defendants' Motions to Exclude Plaintiffs' General Causation Expert Opinions in the following order:

1. Defendants' Motion to Exclude Plaintiffs' General Causation Experts' Opinions Regarding Autism Spectrum Disorder;
2. Defendants' Motion to Exclude Plaintiffs' General Causation Experts' Opinions Regarding Attention Deficit Hyperactivity Disorder; and
3. Defendants' Motion to Exclude Plaintiffs' General Causation Experts' Opinions Regarding Biological Plausibility/Mechanism.<sup>1</sup>

Defendants also note that they have prepared a glossary of terms to accompany their motions, in an effort to aid the Court in its reading of the materials. Defendants' glossary is attached for the Court's reference as Exhibit 171 to the Declaration filed in support of Defendants' Motions (DE 1182-30).

As to Paragraph (2) of the August 3 Order, Defendants respectfully submit that all three of Defendants' Motions to Exclude Plaintiffs' General Causation Expert Opinions are properly addressed together due to their overlapping subject matter.

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<sup>1</sup> During the course of Defendants' filing of the Declaration in support of Defendants' Motions, along with the exhibits referenced therein, we received a number of error messages and time-outs from the ECF system. To ensure that all documents were timely filed before the Court, Defendants split the exhibits to the Motions into separate filings, which required the filing of duplicative copies of the Declaration (*see* DE 1175, 1177, 1179, 1180, 1181, 1182).

Hon. Denise L. Cote  
September 19, 2023  
Page 2 of 2

Defendants appreciate the Court's consideration of this matter.

Respectfully submitted,

*/s/ Kristen L. Richer*